



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 7, 1995

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Robert Staab, Manager  
Environmental Compliance  
The Circle K Corporation  
PO Box 52084  
Phoenix, AZ 85072-2084

**Re: Transition from Manual Inventory Reconciliation with Annual  
Tightness Test to Monthly Statistical Inventory Reconciliation**

Dear Mr. Staab:

This is in response to your letter of October 4, 1994 (copy enclosed) in which you request clarification as to the regulatory requirements associated with the transition from one form of leak detection to another.

First, changing from one acceptable leak detection method to another can be done at any time. Contrary to the assumption in your letter, Environmental Protection Agency (EPA) regulations do not require that once a method is chosen, it must be used for a full, twelve-month "cycle." Consequently, once you successfully switch over to an acceptable monthly monitoring method, you do not need to continue manual reconciliation of inventory records. Similarly, pursuant to the Federal regulations (40 CFR §280.41(a)), migration to an acceptable monthly monitoring method negates the need to perform an annual tank tightness test. (Note, however, that, depending on the type of piping system employed and the type of release detection used, you may still be required to perform periodic line tightness tests.) Finally, regardless of method or change in method, you should ensure that all leak detection records are properly maintained in accordance with §280.45.

Of course, please keep in mind that states in which you do business may have additional requirements. Please consult with the underground storage tank programs in those states to learn of any state-specific conditions.

I hope this clarifies the issues you raised. Should you have further questions, please contact Bill Faggart at (703) 308-8897.

Sincerely,

/s/

Lisa Lund, Acting Director  
Office of Underground Storage Tanks

Enclosure

cc: UST/LUST Regional Program Managers  
Dave Webster, New England Region  
Stan Siegel, Region II  
Robert Greaves, Region III  
Mary Kay Lynch, Region IV  
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